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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

ELIZABETH BAKALAR,

Plaintiff,

v.

MICHAEL J. DUNLEAVY; in his  
individual and official capacities;  
TUCKERMAN BABCOCK; and the  
STATE OF ALASKA,

Defendants.

Case No. 3:19-cv-00025-JWS

**JOINT MOTION RE SUMMARY  
JUDGMENT BRIEFING AND  
DISCOVERY DEADLINES**

The Parties jointly request that the Court extend deadlines for completion of briefing on Defendants' Motion for Summary Judgment (Dkt. 56) and Plaintiff's Cross-Motion for Summary Judgment (Dkt. 76) and that the Court extend pretrial deadlines to allow additional time to complete fact discovery and file motions in limine.

The Parties request the Court allow Defendants until September 17, 2021, to file a combined reply in support of their summary judgment motion and opposition to Plaintiff's summary judgment motion, and allow Plaintiff until October 8, 2021, to reply in support of her summary judgment motion.

The Parties also request that the Court allow approximately 60 days after the Court rules on the Parties summary judgment motions to complete discovery and file motions in

limine. The Court's decision could be dispositive of some or all claims and would likely be informative of further discovery needs. Thus, this jointly requested extension would allow the Parties to avoid discovery that might become unnecessary and/or to complete discovery in a more efficient manner based on the Court's ruling.

The Parties respectfully request that the Court set new deadlines after the Parties jointly submit an updated proposed schedule within 10 days of the Court's final ruling on the summary judgment motions.

CHOATE LAW FIRM LLC  
Attorneys for Plaintiff

Dated: August 18, 2021

By s/ Mark C. Choate (w/consent)  
Mark C. Choate, ABA No. 8011070

LANE POWELL LLC  
Attorneys for Defendants

Dated: August 18, 2021

By s/ Michael B. Baylous  
Brewster H. Jamieson, ABA No. 8411122  
Michael B. Baylous, ABA No. 0905022

I certify that on August 18, 2021, a copy of  
the foregoing was served electronically on:

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s/ Michael B. Baylous